

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE APPLICATION OF Sakab Saudi Holding :
Company, Alpha Star Aviation Services Company, :
Enma Al Ared Real Estate Investment and Development :
Company, Kafa'at Business Solutions Company, : Misc. Civil Action No _____
Security Control Company, Armour Security Industrial :
Manufacturing Company, Saudi Technology & Security :
Comprehensive Control Company, Technology Control :
Company, New Dawn Contracting Company, and Sky :
Prime Investment Company, :
:
:
:
For Order Pursuant to 28 U.S.C. § 1782 for the Issuance :
of Subpoenas to Citibank NA, HSBC Bank USA NA, :
Cadwalader, Wickersham & Taft LLP, and Jonathan :
Wainwright, Esq. :
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**EX PARTE APPLICATION PURSUANT TO 28 U.S.C. § 1782 FOR THE ISSUANCE OF
SUBPOENAS TO CITIBANK NA, HSBC BANK USA NA, CADWALADER,
WICKERSHAM & TAFT LLP, AND JONATHAN WAINWRIGHT, ESQ.**

Based on the concurrently filed Memorandum of Law in Support of *Ex Parte* Application for Discovery Pursuant to 28 U.S.C. § 1782, the Declaration of Ethan Schiff dated February 9, 2021 and exhibits thereto, and the Declaration of Jonathan S. Sack dated February 10, 2021 (the “Sack Declaration”) and exhibits thereto, Applicants apply to this Court for an Order pursuant to 28 U.S.C. § 1782(a) granting them leave to serve the subpoenas attached to the Sack Declaration on Citibank NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright, Esq.

Dated: New York, New York
February 11, 2021

Respectfully submitted,

MORVILLO, ABRAMOWITZ, GRAND,
IASON, & ANELLO PC

By: /s/ Jonathan S. Sack

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Contracting Company, and Sky Prime
Investment Company*